

**THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WILLIAM SOJKA, individually and on behalf	:	Case No. 1:24-cv-10678
of all others similarly situated,	:	(Related Case: 1:24-cv-10678)
Plaintiff	:	
	:	Assigned for all purposes to:
AMERICAN NEIGHBORHOOD MORTGAGE	:	The Honorable Renee Marie Bumb
ACCEPTANCE COMPANY d/b/a ANNIEMAC	:	
HOME MORTGAGE,	:	
Defendant.	:	

STIPULATION TO EXTEND TIME TO PLEAD

Pursuant to Federal Rule of Civil Procedure 6(b), and Local Rule 6.1, Plaintiff William Sojka (“Plaintiff”) and Defendant American Neighborhood Mortgage Acceptance Company (“Annie Mac” or “Defendant”) hereby stipulate that the time within which Annie Mac may answer, move or otherwise respond to the Complaint in the above-captioned action (the “Action”) shall be extended by sixty (60) days up to and including February 24, 2025. In support of this Stipulation, the parties state as follows:

1. On November 22, 2024, Plaintiff filed this Action in the United States District Court for the District of New Jersey.
2. On December 4, 2024, Plaintiff effected service of process on Annie Mac.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant must answer, move, or otherwise respond to the Complaint in this Action by December 26, 2024.
4. This is one of eleven (11) putative class actions filed in this Court against Annie Mac related to the same underlying data security incident.
5. Plaintiffs' counsel in the eleven (11) putative class actions have stated that they intend to

move to consolidate these actions into a single case, and Annie Mac will not oppose that motion for consolidation.

6. The parties hereby stipulate to a 60-day extension of the December 26, 2024 deadline, up to and including February 24, 2025.

7. The parties believe this extension should grant the Plaintiffs in the eleven (11) pending actions to prepare and file a motion for consolidation.

8. This is the first request for any extension in this matter.

Stipulated and agreed to this 20th day of December 2024, by:

<p><u>/s/ Gary S. Graifman</u> Gary S. Graifman KANTROWITZ, GOLDHAMER & GRAIFMAN, P.C. 135 Chestnut Ridge Road Montvale, New Jersey 07645 Tel: (201) 391-7000 Fax: (201) 307-1086 ggraifman@kgglaw.com</p> <p>Daniel Srourian, Esq.* SROURIAN LAW FIRM, P.C. 3435 Wilshire Blvd., Suite 1710 Los Angeles, California 90010 Tel: (213) 474-3800 Fax: (213) 471-4160 daniel@slfla.com</p> <p><i>Attorneys for Plaintiff and the Class</i></p> <p><i>*Pro Hac Vice Forthcoming</i></p>	<p><u>/s/ Richard M. Haggerty</u> Richard M. Haggerty Mullen Coughlin LLC 426 W. Lancaster Avenue, Suite 200 Devon, PA 19333 Tel: (267) 930-1594 Fax: (267) 930-4771 rhaggerty@mullen.law</p> <p><i>Attorneys for American Neighborhood Mortgage Acceptance Company d/b/a Annie Mac Home Mortgage, Defendant</i></p>
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CERTIFICATE OF SERVICE

I, Richard M. Haggerty, certify that the foregoing *Stipulation to Extend Time to Plead* was served on all counsel of record via the Court's ECF system on December 20, 2024.

/s/ Richard M. Haggerty
Richard M. Haggerty